

GLEN MOODY

*** NINTH JUDICIAL DISTRICT COURT**

***DOCKET NUMBER:** 266 584 E

VERSUS

***PARISH OF RAPIDES**

**OUTBACK STEAKHOUSE OF
FLORIDA, LLC and BLOOMIN
BRANDS, INC.**

***STATE OF LOUISIANA**

PETITION FOR DAMAGES

NOW INTO COURT, through undersigned counsel, comes plaintiff, **GLEN MOODY**, a person of the full age of majority, and current resident and domiciliary of Lafayette Parish, Louisiana, who respectfully represents the following:

1.

Made defendants herein are:

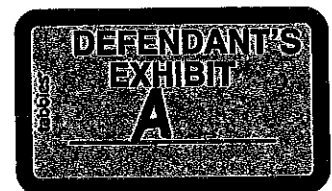
- a) **OUTBACK STEAKHOUSE OF FLORIDA, LLC**, a foreign limited liability company, authorized and doing business in the State of Louisiana, who can be served through its registered agent, Corporate Creations Network, Inc., 1070-B West Causeway Approach, Mandeville, LA 70471; and
- b) **BLOOMIN BRANDS, INC.**, a foreign corporation, authorized and doing business in the State of Louisiana, who can be served through its registered agent, Joseph Kadow 2202 N. West Shore Blvd., 5th Floor, Tampa, Florida 33607 via the Louisiana Long Arm Statute.

2.

Defendants, **OUTBACK STEAKHOUSE OF FLORIDA, LLC** and **BLOOMIN BRANDS, INC.**, are liable unto plaintiff *in solido* for the full sum of the amount of damages reasonable in the premises to be proven at the trial on the merits, plus interest from the date of judicial demand until paid, and for all costs of these proceedings and for all general and equitable relief that plaintiff is entitled to for the following to-wit:

3.

On or about April 17, 2019, plaintiff, **GLEN MOODY**, was a patron of the restaurant, **OUTBACK STEAKHOUSE**, located at 3217 S. MacArthur Drive in the City of Alexandria, Parish of Rapides, Louisiana.



4.

During his visit to the OUTBACK STEAKHOUSE, Plaintiff, **GLEN MOODY**, assisted a child to the restroom. While walking the child to the restroom, the he fell forcefully to the floor near the restrooms. Unbeknownst to the Plaintiff, the floor was wet causing it to be very slippery.

5.

Upon information and belief, the OUTBACK STEAKHOUSE described above was owned and/or operated by defendants, **OUTBACK STEAKHOUSE OF FLORIDA, LLC** and/or **BLOOMIN BRANDS, INC.**

6.

The incident was the direct result of the negligence of the Defendants, **OUTBACK STEAKHOUSE OF FLORIDA, LLC** and/or **BLOOMIN BRANDS, INC.**, which negligence consisted more particularly of the following:

- a) Failure to provide warning of slippery floor;
- b) Failure to keep premises free from hazardous conditions;
- c) Failure to properly inspect the premises for hazardous conditions;
- d) Failure to adequately train employees on preventing or warning the public of safety hazards; and
- e) Failure to adequately maintain and clean the premises.

7.

As a result of the accident on April 17, 2019, sued on herein, Plaintiff, **GLEN MOODY**, suffered personal injuries and damages including, but not limited to:

- a) Injuries to the neck and shoulders;
- b) Injuries to the back;
- c) Injuries to the leg;
- d) Injuries to the knee; and
- e) Sprained and strained muscles, tendons, and ligaments of the body.

8.

Accordingly, Plaintiff **GLEN MOODY**, itemizes his recoverable damages as follows:

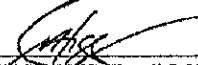
- a) Physical pain and suffering past, present and future;
- b) Mental pain, anguish and distress past, present and future;
- c) Loss of enjoyment of life past, present and future;
- d) Loss of consortium, household services, and society;
- e) Impairment;
- h) Permanent disfigurement; and
- i) Medical expenses past, present and future.

WHEREFORE, Plaintiff **GLEN MOODY** prays that defendants be duly served with a copy of the Petition for Damages, and after all legal delays and due proceedings had, there be judgment in favor of Plaintiff, **GLEN MOODY**, and against defendants, **OUTBACK STEAKHOUSE OF FLORIDA, LLC** and **BLOOMIN BRANDS, INC.**, jointly, severally, and *in solido*, for compensatory damages and special damages in an amount that will adequately satisfy the demands of justice, together with legal interest thereon from the date of judicial demand until paid.

Plaintiff further prays for all costs of these proceedings and for any other relief to which plaintiff is entitled under law and evidence.

Respectfully Submitted,

LABORDE EARLES LAW FIRM, LLC


SCOTT F. HIGGINS, Bar# 26924
1901 Kaliste Saloom Road
P.O. Box 80098
Lafayette, Louisiana 70598-0098
Phone (337) 261-2617
Fax (337) 261-1934
Attorney for Plaintiff, **GLEN MOODY**

2019 OCT 25 PM 1:09
RECEIVED
JOSHUA L. HOOTEN
CLERK OF COURT

PLEASE SERVE:

OUTBACK STEAKHOUSE OF FLORIDA, LLC,
through its registered agent,
Corporate Creations Network, Inc.
1070-B West Causeway Approach
Mandeville, LA 70471

**BY CITATION AND CERTIFIED COPY OF PETITION THROUGH LONG-ARM
STATUTE**

BLOOMIN BRANDS, INC.
through its registered agent,
Joseph Kadow 2202 N. West Shore Blvd., 5th Floor,
Tampa, Florida 33607

**CORPORATE CREATIONS®**

Registered Agent • Director • Incorporation

Corporate Creations Network Inc.

11380 Prosperity Farms Road #221E, Palm Beach Gardens, FL 33410

Outback Steakhouse of Florida, LLC
 Alex Velez
 CorVel Corporation
 2202 N. West Shore Blvd, 5th Floor
 Tampa FL 33607

11/05/2019

SERVICE OF PROCESS NOTICEThe following is a courtesy summary of the enclosed document(s). **ALL information should be verified by you.**

Item: 2019-1450

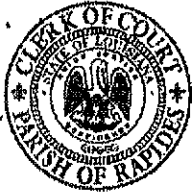
Note: Any questions regarding the substance of the matter described below, including the status or how to respond, should be directed to the contact set forth in line 12 below or to the court or government agency where the matter is being heard. **IMPORTANT:** All changes or updates to the SOP contact individuals or their contact information must be submitted in writing to SOPcontact@corpcreations.com. Any changes will become effective upon written confirmation of Corporate Creations.

1.	Client Entity: Outback Steakhouse of Florida, LLC
2.	Title of Action: Glen Moody vs. Outback Steakhouse of Florida, LLC, et al.
3.	Document(s) Served: Law Firm Letter Petition for Damages
4.	Court/Agency: Parish of Rapides Ninth Judicial District Court
5.	State Served: Louisiana
6.	Case Number: 266, 584
7.	Case Type: Personal Injury
8.	Method of Service: Hand Delivered
9.	Date Received: Monday 11/4/2019
10.	Date To Client: Tuesday 11/5/2019
11.	# Days When Answer Due: 15 Answer Due Date: 11/19/2019 <small>CAUTION: Client is solely responsible for verifying the accuracy of the estimated Answer Due Date. To avoid missing a crucial deadline, we recommend immediately confirming in writing with opposing counsel that the date of the service in their records matches the Date Received.</small>
12.	SOP Sender: Scott F. Higgins <small>(Name, City, State, and Phone Number)</small> Lafayette, LA 337-261-2617
13.	Shipped To Client By: Email Only with PDF Link
14.	Tracking Number:
15.	Handled By: 191
16.	Notes: Also Attached: Request for Notice of Trial, Hearings & Orders

NOTE: This notice and the information above is provided for general informational purposes only and should not be considered a legal opinion. The client and their legal counsel are solely responsible for reviewing the service of process and verifying the accuracy of all information. At Corporate Creations, we take pride in developing systems that effectively manage risk so our clients feel comfortable with the reliability of our service. We always deliver service of process so our clients avoid the risk of a default judgment. As registered agent, our role is to receive and forward service of process. To decrease risk for our clients, it is not our role to determine the merits of whether service of process is valid and effective. It is the role of legal counsel to assess whether service of process is invalid or defective. Registered agent services are provided by Corporate Creations Network Inc.

11380 Prosperity Farms Road #221E, Palm Beach Gardens, FL 33410 Tel: (561) 694-8107 Fax: (561) 694-1639

www.CorporateCreations.com



ROBIN L. HOOTER
CLERK OF COURT * RAPIDES PARISH

701 Murray Street, Suite 102, Alexandria, Louisiana 71301

Phone (318) 473-8153

Fax (318) 473-4667
www.rapidesclerk.org

Civil Fax (318) 487-9361

SERVE

CITATION

NO. 266,584 E

GLEN MOODY
VERSUS
OUTBACK STEAKHOUSE OF FLORIDA LLC ET AL

NINTH JUDICIAL DISTRICT COURT
PARISH OF RAPIDES
STATE OF LOUISIANA

TO: OUTBACK STEAKHOUSE OF FLORIDA LLC
%CORPORATE CREATIONS NETWORK INC, 1070 B WEST CAUSEWAY APPRO
MANDEVILLE LA 00000
ST. TAMMANY PARISH

YOU ARE HEREBY SUMMONED TO COMPLY WITH THE DEMAND CONTAINED IN THE PLEADING(S) FILED IN THE ABOVE ENTITLED AND NUMBERED CAUSE, A DULY CERTIFIED COPY IS ATTACHED AND TO BE SERVED, OR FILE YOUR ANSWER OR OTHER PLEADINGS IN THE OFFICE OF THE CLERK OF THE NINTH JUDICIAL DISTRICT COURT, RAPIDES PARISH, CITY OF ALEXANDRIA, WITHIN FIFTEEN(15) DAYS AFTER SERVICE HEREOF. YOU MAY FILE YOUR WRITTEN ANSWER OR PLEADING IN PERSON OR BY MAIL. IF YOU FILE BY MAIL, THE PLEADING MUST BE RECEIVED BY THE 15TH DAY. YOUR FAILURE TO COMPLY WILL SUBJECT YOU TO THE PENALTY OF ENTRY OF DEFAULT JUDGMENT AGAINST YOU.

WITNESS THE HONORABLES, THE JUDGES OF SAID COURT, AT ALEXANDRIA, LOUISIANA,
THIS 28TH DAY OF OCTOBER, 2019.

THE FOLLOWING PLEADINGS ARE ATTACHED FOR SERVICE: PETITION.

SCOTT F HIGGINS
1901 KALISTE SALOOMP O BOX 80098
LAFAYETTE LA 70598-0098
Filing Attorney

ROBIN L. HOOTER
Clerk of Court

BY Karan Dorsey
Deputy Clerk of Court

SHERIFF STAMP BELOW

RECEIVED
2019 OCT 31 P 2:19